

# BARR

CONGRESS

November 5, 2013

Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

MUR#

6762

Re: Violations of Federal Campaign Finance Law by Tricia Pridemore for Congress

In my capacity as campaign manager to United States congressional candidate Bob Barr, I am writing to bring to your attention a violation of the Federal Election Campaign Act (the "Act") and Federal Election Commission ("FEC") regulations by Tricia Pridemore for Congress ("TPC"). TPC is the principal campaign committee of Ms. Tricia Pridemore, a Republican candidate for the United States House of Representatives in Georgia's 11<sup>th</sup> Congressional District for the 2014 election cycle.

It has recently come to my attention that TPC has improperly utilized the proprietary donor information of Barr Congress, Inc. (the principal campaign committee of Mr. Barr) for its own campaign advertising and fundraising purposes. This act was discovered through the preemptive "salting" of Barr Congress' 2013 July Quarterly FEC disclosure report with fictitious names to detect the impermissible use of individual contributor information by outside organizations. As you know, FEC regulations permit campaign committees to "salt" their report with up to 10 fictitious names per disclosure to help discover and defend against incidences of misuse. When such fictitious contributors receive campaign communications from other committees and organization, it is *prima facie* evidence that those organizations have illegally misappropriated the donor data of the "salting" committee. This is precisely what has occurred in this instance.

In submitting its 2013 July Quarterly FEC disclosure report, Barr Congress "salted" its filing with a number of fictitious donors. As required by FEC regulations, our committee sent this confidential list of false names to the FEC Reports Analysis Division under separate cover letter. Included among those fictional donors

Earlier this week, received a formal campaign advertisement and fundraising solicitation from TPC. (See Exhibit C attached hereto). That solicitation came directly to the fictitious address of the "salted" Barr Congress contributor in an official TPC campaign envelope, and included an invitation to a November 19, 2013 fundraiser supporting Ms. Pridemore's campaign

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for the U.S. House of Representatives. The mailer received by \_\_\_\_\_ also included a direct fundraising solicitation card and an official return envelope from TPC.

Given the fact that each of the items contained in TPC's communication with \_\_\_\_\_ involve direct fundraising requests for the Pridemore congressional campaign, and the fact that \_\_\_\_\_ is a fictitious individual whose identity and address was only disclosed to the public through Barr Congress' FEC disclosure reports, it is abundantly clear that TPC is in violation of the "sale or use" restrictions set forth in the Act and its associated regulations. *See, e.g., 2 U.S.C. 438(a)(4) and 11 CFR 104.15.* While this fact is indisputable as it relates to TPC's fundraising communications with \_\_\_\_\_ it is also highly likely that the misappropriation of Barr Congress' contributor data by TPC extends far beyond this one "salted" name. If TPC is willing to violate the express provisions of federal campaign finance law for committee fundraising purposes, there is no reason to suspect that such violations stop at this one communication with \_\_\_\_\_. As such, in investigating the activities of TPC in the present matter, I would request that the FEC take all appropriate measures to ascertain the extent to which Ms. Pridemore's campaign committee has misused the proprietary contributor information of Barr Congress, Inc.

In light of the facts set forth above, I hereby request that the Commission take action to investigate TPC's violation of federal campaign finance law governing the sale or use of publicly-disclosed committee contributor information. In doing so, I would request that the FEC seek any and all relief permitted by law against Ms. Pridemore's campaign committee. I would also ask that the Commission provide Barr Congress with as much information as possible on the extent of TPC's misappropriation of our campaign's donor data.

Thank you in advance for your time and consideration of this matter. Please do not hesitate to contact me if I can provide additional information that may be useful to the completion of your investigation. Additionally, if our campaign is made aware of any communications by TPC to other Barr Congress "salted" contributors moving forward, I will be sure to contact your office with appropriate documentation confirming such conduct.

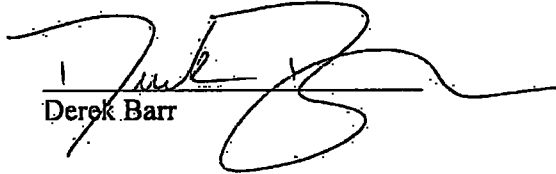
Respectfully submitted,

  
Derek Barr, Campaign Manager  
Barr Congress, Inc.

cc: Stefan Passantino, Esq.

**Certification by Complainant**

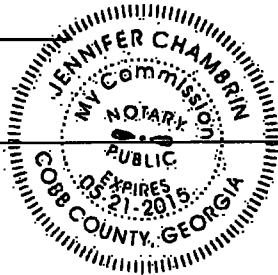
I hereby swear and affirm that the facts presented in this complaint are true to the best of my knowledge, information and belief. Sworn pursuant to 18 U.S.C. §1001.

  
Derek Barr

Subscribed and sworn to before me this 6<sup>th</sup> day of November, 2013.

  
Notary Public

My Commission Expires: \_\_\_\_\_



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2770 Cobb Parkway, #140-304  
Marietta, GA 30060

**AMERICAN FREEDOM**  
FOREVER

**Abstract**

TRICIA  
**PRIDEMORE**  
FOR CONGRESS

Please join us for a fundraising reception in support of

**Tricia Pridemore**  
*Republican Candidate for Congress (GA-11)*

Tuesday, November 19, 2013  
6:30 pm to 8:30 pm

The home of Frank and Liza Leiter

Marietta, GA 30064

**Benefactor \$2,600**

**Patron \$1,000**

**Fellow \$500**

Suggested Minimum Contribution \$250

RSVP to Ashley@pridemoreforcongress.com

Paid for by Pridemore for Congress

**TRICIA PRIDEMORE**  
FOR CONGRESS

☐ \$2,600   ☐ \$1,000   ☐ \$500   ☐ \$250   ☐ \$100   ☐ \$50   ☐ Other: \$\_\_\_\_\_

Please accept a contribution via credit or debit card:   ☐ Master Card   ☐ Visa   ☐ AMEX

**TURN OVER PLEASE**

STOP HERE

Name \_\_\_\_\_

Address \_\_\_\_\_

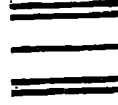
City/State/Zip \_\_\_\_\_

Home Phone \_\_\_\_\_ Work Phone \_\_\_\_\_

Email \_\_\_\_\_

Occupation/Employer \_\_\_\_\_

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Please Place  
Post Office  
Stamp Here

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**PRIDEMORE**  
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Marietta, GA 30060